

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA	)	
	)	
v.	)	Docket No. 2:22-cr-109-1
	)	
DEREK ARIE,	)	
	)	
Defendant.	)	

**UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE**

Defendant Derek Arie, by and through undersigned counsel, hereby submits this Unopposed Motion to Modify Conditions of Release. Specifically, Mr. Arie seeks to modify condition 7(g), which currently prohibits Mr. Arie from all contact with P.B. except for discussions regarding children. Mr. Arie and P.B. have been in an intimate relationship prior to his arrest in this case. They share a daughter together and are expecting another child soon. Mr. Arie and P.B. are committed to one another and the forced separation has been extremely difficult for both of them and their young daughter. Since his release, Mr. Arie has worked extremely hard to turn his life around. He regularly attends AA meetings and recently received his 6-month sobriety coin. P.B. is likewise successfully battling her own addiction and Mr. Arie wants and needs to be together with P.B. so that they can lean on each other for support, and work together for their family.

On March 15, 2023, the Court recognized Mr. Arie's successes on release and modified his conditions to place him on a curfew as opposed to home detention. He continues to be successful and the Court should permit Mr. Arie and P.B. to resume their relationship, which will allow them to better support one another and parent their children. The government does not oppose this motion.

WHEREFORE, Defendant respectfully requests that the Court grant this Motion and Order that condition 7(g) is modified to eliminate the prohibition regarding contact with P.B., with the balance of condition 7(g) unchanged.

Dated: April 17, 2023

PRIMMER PIPER EGGLESTON & CRAMER PC

By: /s/ Kevin M. Henry  
Kevin M. Henry  
30 Main Street, Suite 500  
P.O. Box 1489  
Burlington, VT 05402-1489  
Tel: (802) 864-0880  
Email: [khenry@primmer.com](mailto:khenry@primmer.com)

*Attorneys for Derek Arie*